

## PROJECTED PROGRAM ACCOMPLISHMENT (PPA)

### DESCRIPTION FORM

State: Michigan DEQ

(The information recorded below is for planning purposes only and not subject to audit.)

Date: June 24, 2004

Program: Air Management

Item: PPA-1

PPA TITLE: Program Administration/Management

PROJECTED STATUS AT END OF FY2004:

PLANNED COMMITMENT FOR FY2005:

A. Work-years of effort: 2.5

A. Work-years of effort: 3.0

B. Key responsible person(s): G. Vinson Hellwig

B. Key responsible person(s): G. Vinson Hellwig

C. Key responsible group: Administration

C. Key responsible group: Administration

D. Estimated total PPA costs: \$ 288,500

D. Estimated total PPA costs: \$ 324,177

#### E. FY2004-2005 Commitment Narrative:

The City of Grand Rapids contract for (FY) 2004 was executed on February 13, 2004. Coordination of the Air Monitoring Program continues. Audits have been conducted in a timely manner and will continue to occur. The (FY) 2005 contract is expected as soon as possible after October 1, 2004.

Cost accounting/expenditure tracking systems will provide the financial information to project costs for the Fiscal Years (FY) 2004 and 2005 application.

The final report will be submitted in the format requested by the EPA.

The Air Quality Division (AQD) continues to provide ample opportunities for public involvement in the Michigan Air Pollution Control Program through a number of different avenues. The Michigan Department of Environmental Quality (MDEQ) Air Webpage; public meetings, public hearings, public notices in newspapers, routine verbal communications, as well as written communications are all parts of the on-going public involvement in the State Air Program.

**Grant Negotiation/Submission:** The AQD commits to work with the EPA to negotiate the annual cooperative agreement and amendments. It must be recognized that the EPA must provide timely guidance to allow the AQD to meet established deadlines, and in the event that this timely guidance is not provided, reasonable deadlines will be established for the AQD to meet.

The MDEQ and EPA are working together on the Southeast Michigan – Southwest Ontario Border Air Quality Strategy pilot project. In both (FY) 2004 and 2005, MDEQ will prove \$30,000 along with EPA proving \$30,000 for a total of \$120,000 that will be used on this project. The funds will go toward paying staff for time spent on project activities such as emissions inventory development, air monitoring activities,

air modeling activities and analysis of US and Canada air management systems. Funds will also be used to support travel needed to achieve project objectives."

**Reports:** The AQD commits to submitting an end-of-year report by the date established in the EPA's (FY) 2004-2005 Guidance. This end-of-year report will include reporting of P2 accomplishments. The final Financial Status Report will be submitted when completed.

**MBE/WBE/EEO:** The AQD commits to continuing implementation of this effort. Assistance has been discussed with Region V to insure that all opportunities are taken.

**Public Information/Education:** The AQD continues to provide ample opportunities for public involvement in the Michigan Air Pollution Control Program through a number of different avenues. Public meetings, public hearings, public notices in newspapers, presentations, outreach events, routine verbal communications, as well as written communications are all parts of the on-going public involvement in the State Air Program.

Informational material that allows ordinary people and industry to make informed decisions related to ambient air quality issues continues to be developed and updated. A heavier emphasis on web outreach is due, in part, to the State of Michigan prohibition on producing print materials in color. The AQD provides near real-time information via the Air Quality Index (AQI), particulate, and ozone maps on the DEQ "AIR" webpage.

Web outreach will expand through an EPA pilot program that will allow those living in SE Michigan to self-select to receive automatic air quality e-mail notifications (and possibly other electronic formats). This is scheduled to take place during the summer of 2004. A link located on the DEQ "AIR" webpage will serve as the portal for this service.

Partnership programs are increasingly utilized as a highly effective method of communication in the area of voluntary pollution reduction. Environmental education efforts targeting both the general public and Grades K-12 are earmarked for evaluation and implementation as well.

**Safety/Training:** The AQD continues to provide safety training and career development for all employees.

## PROJECTED PROGRAM ACCOMPLISHMENT (PPA)

### DESCRIPTION FORM

State: Michigan DEQ

(The information recorded below is for planning purposes only and not subject to audit.)

Date: August 12, 2004

Program Category: Air Management

Index: PPA-2

PPA TITLE: Attainment and Maintenance Planning and Implementation

PROJECTED STATUS AT END OF FY2004:

PLANNED COMMITMENT FOR FY2005:

A. Work-years of effort: 6.0

A. Work-years of effort: 6.0

B. Key responsible person: Robert Irvine

B. Key responsible person: Robert Irvine

C. Key responsible group: SDU/ERA Units

C. Key responsible group: SDU/ERA Units

D. Estimated total PPA costs: \$ 548,400

D. Estimated total PPA costs: \$ 528,354

**E. FY2004-2005 Commitment Narrative:**

The MDEQ is providing recommendations to EPA on non-attainment area designations for PM2.5 based on the new PM2.5 NAAQS and will provide comments to EPA on the draft implementation guidance for the new PM2.5 standard.

The MDEQ continued air quality monitoring and data collection in maintenance areas. See PPA-5 and PPA-6 descriptions of this and all other monitoring and inventory activities, respectively.

The MDEQ completed a revision to the maintenance plan for the Southeast Michigan 1 hour ozone maintenance area and is waiting for EPA approval. The MDEQ continued to implement contingency measures; Stage I vapor recovery controls, and lower RVP (7.8) gasoline during the summer season. In addition, the MDEQ participated in and provided technical support for Ozone Action voluntary emission reduction programs in Southeast and West Michigan.

The MDEQ continued to implement the Transportation Conformity SIP where applicable; reviewed and provided input to metropolitan planning organizations on conformity analyses; and provided letters of comment or approval to MDOT, FHWA, and EPA. The MDEQ implemented the General Conformity SIP and reviewed general conformity analyses and provided comments to the appropriate agencies.

The MDEQ continued to participate in LADCO. This included participation in Project Team calls and meetings as well as work in the modeling, data analysis, emissions, and growth/strategy committees. MDEQ completed work on revising several rules for the NOx SIP call. In addition, the MDEQ continued working with our Regional Planning Organization (LADCO) in addressing regional haze requirements.

Concerning the PM-10 and PM-2.5 NAAQS, the MDEQ kept abreast of activity regarding revision and implementation of these standards, respectively. MDEQ provided comments to EPA on the designations for PM2.5.

The MDEQ completed rulemaking activities on a variety of revisions to air rules, including new NOx control rules and dry cleaning rules.

**F. FY2005 Commitment:**

**1. Ozone SIP**

The MDEQ will continue to work with EPA in the development of programs for implementing the new 8 hour ozone standard.

The MDEQ will continue to keep abreast of activity involving the ozone standard and will review EPA proposals on the ozone standard as it becomes available.

The MDEQ will continue to implement SIP requirements for ozone maintenance areas regarding monitoring (see PPA-5) and development of periodic emission inventories (see PPA-6). MDEQ will implement control measures in maintenance areas, if necessary. The MDEQ will also continue ozone monitoring throughout the state as described in our air monitoring network plan (see PPA-5).

The MDEQ will continue to implement the NOx SIP call program.

The MDEQ will continue to participate in LADCO ozone-related activities, gearing up for SIP modeling and development for the 8-hour ozone standard in the LADCO region. MDEQ will continue to work with LADCO in developing modeling for assessing PM 2.5 issues in the state and region. In addition, the MDEQ will continue to participate in planning and technical activities for addressing the regional haze program through the LADCO Regional Planning Organization.

The MDEQ will continue to participate in and provide technical support for Ozone Action voluntary emission reduction programs. The MDEQ will continue to pursue implementation of pollution prevention in its programs.

MDEQ will submit revisions to our Conformity SIP for all 8-hour ozone non-attainment areas. Based upon the needed revisions described in the July 2004 amendments to EPA's Conformity Rules, our submittal will be made by June 15, 2005. If further legislation, rules, or guidance change the type of revisions needed, this submittal date will need to be re-evaluated.

MDEQ will participate in Conformity Interagency Workgroup meetings as necessary.

MDEQ will review Conformity analyses as necessary.

**2. Miscellaneous – Rules**

The MDEQ will complete rulemaking on revisions to Part 4 rules pertaining to Wayne county sources. Rulemaking will begin on a rule for commercial and industrial solid waste incinerators, a rule for small municipal combustors, revisions to Rule 932 for large municipal combustors, a rule for secondary aluminum sources, and PSD rules. Rulemaking on other rule packages, as necessary, will be undertaken.

3. PM-2.5 SIP

The MDEQ will work with EPA in the development of programs for implementing the revised PM<sub>2.5</sub> NAAQS. The MDEQ will continue to keep abreast of activity involving the PM-2.5 standard and will review EPA guidance on PM-2.5 as it becomes available. MDEQ will continue to work with LADCO in model development eventually leading to SIP development.

4. PM-10 SIP

The MDEQ will continue to implement the PM-10 maintenance plan and initiate contingency measures, if required.

## PROJECTED PROGRAM ACCOMPLISHMENT (PPA)

### DESCRIPTION FORM

(The information recorded below is for planning purposes only and not subject to audit.)

State: Michigan DEQ

Date: June 29, 2004

Program: Air Management

Index: PPA-3

PPA Title: Air Toxics

#### PROJECTED STATUS AT END OF FY2004:

A. Work-Years of Effort: 5.6

B. Key Responsible Person: Cathy Simon

C. Key Responsible Group: Toxics Unit

D. Estimated Total PPA Costs: \$ 511,840

#### PLANNED COMMITMENT FOR FY2005:

A. Work-Years of Effort: 5.6

B. Key Responsible Person: Cathy Simon

C. Key Responsible Group: Toxics Unit

D. Estimated Total PPA Costs: \$ 493,130

#### E. FY2004–FY2005 Commitment Narrative:

The AQD will administer Section 112 standards in accordance with the direct final rule approving Michigan's request for delegation under Section 112(l) of the Clean Air Act (63 FR 64632, November 23, 1998), and as outlined in the memorandum of agreement (MOA) between the USEPA and the MDEQ, signed by David Kee on May 8, 1996, and Dennis Drake on May 16, 1996. The AQD will administer the requirements of Section 111 and 129 for municipal waste combustors, landfills, medical waste incinerators, and commercial and industrial solid waste incinerators as described in PPA-2.

The AQD will develop health based screening levels for toxic air contaminants emitted from all sources subject to the State's air toxic regulations. These screening levels will be used to ensure emissions of toxic air contaminants from these sources do not adversely impact human health. For sources subject to the State's air toxic regulations and where the AQD identifies a potential concern for exposures beyond direct inhalation, cumulative exposures, or interactive effects of air toxics, further risk assessment work will be done to address these concerns.

The AQD will maintain a staff contact to refer questions on indoor air issues to the proper agencies for response.

The AQD will participate in the bimonthly State/Region 5 risk assessment conference calls.

As resources allow, the AQD will analyze the data from the Detroit air toxics monitoring pilot project for issues not covered in any national contract, including characterization of the potential health risks from air toxics in the area. Other air toxics monitoring commitments are in the Monitoring PPA.

The AQD will help promote outreach on voluntary emission control retrofit programs for existing heavy-duty diesel engines/school buses as resources allow.

## PROJECTED PROGRAM ACCOMPLISHMENT (PPA)

### DESCRIPTION FORM

(The information recorded below is for planning purposes only and not subject to audit.)

State: Michigan DEQ

Date: June 23, 2004

Program: Compliance Program

PPA #: PPA-4-1

PPA Title: Inventory and Reporting

#### PROJECTED STATUS AT END OF FY 2004:

- A. Work-years of effort: 14.0
- B. Key responsible person(s): Gerald Avery & Michael Bray
- C. Key responsible group: Field Operations Section Technical Programs Unit
- D. Estimated total PPA costs: \$ 1,279,600

#### PLANNED COMMITMENT FOR FY2005:

- A. Work-years of effort: 14.0
- B. Key responsible person(s): Gerald Avery & Michael Bray
- C. Key responsible group: Field Operations Section Technical Programs Unit
- D. Estimated total PPA costs: \$ 1,232,826

#### E. FY2004-2005 Commitment Narrative:

##### For non-Title V sources, the MDEQ will:

##### 1.0 Maintain Inventory of sources subject to federal regulations.

The MDEQ commits to maintain an up-to-date inventory for sources including New Source Performance Standards (NSPS), non-transitory National Emission Standards for Hazardous Air Pollutants (NESHAP) sources (including sources subject to promulgated Maximum Achievable Control Technology (MACT) standards as notification is provided or through inspections that identify MACT applicability), and sources avoiding New Source Review (NSR)/Prevention of Significant Deterioration (PSD) review through permit restrictions (synthetic minor).

##### 2.0 Quarterly Reports

Within 30 days of the end of each quarter, the MDEQ commits to submit quarterly reports to the EPA. The reports will include the following information:

- a) Identification of all NSPS, non-transitory NESHAP (including MACT facilities) and synthetic minor sources, added that quarter to the inventory of sources, with the following information provided as available: Facility name and address, the MDEQ registration number, Standard Industrial Classification code, and NESHAPS subpart(s) to which the facility is subject.

- b) The quarterly compliance status of all NSPS and non-transitory NESHAP facilities. This shall include all revisions in compliance status since the last report, such as: violations observed, required facility reporting that is delinquent or missing, CEMS violations, newly discovered sources that have avoided NSR/PSD review, violations of the MDEQ enforcement settlements resolving High Priority Violations (HPV\*), and past violations that were resolved during the quarter.
- c) The dates of the partial compliance evaluation that included an on-site inspection conducted on NSPS and non-transitory NESHAP facilities during the reporting quarter.
- d) Identification of sources for which NESHAP and MACT waiver requests have been received during the quarter and the status of action on such requests.

### 3.0 Reports As Needed

- 3.1 The MDEQ will continue to provide copies of all draft administrative consent orders for federally regulated sources to the EPA during the public comment period. Copies of final compliance orders and consent decrees approved by the MDEQ will be provided to Region V after final signatures are obtained.
- 3.2 The MDEQ commits to provide documentation on individual NSPS, and non-transitory NESHAP violations within 30 days of the EPA's request.
- 3.3 The MDEQ commits to submit inspection reports to the EPA upon request.
- 3.4 HPVs\* will be identified in monthly conference calls. See PPA 4-3.

### 4.0 Compliance Monitoring Strategy (CMS)

The MDEQ has allocated resources to the completion of a CMS plan to upload air compliance and enforcement data directly into AFS. The MDEQ commits to work with EPA Region V to install, activate and use the Universal Interface as feasible software becomes available and operational.

Notes: [\*] High Priority Violations are as defined in the HPV/T&A Guidance dated December 22, 1998.



## PROJECTED PROGRAM ACCOMPLISHMENT (PPA)

### DESCRIPTION FORM

(The information recorded below is for planning purposes only and not subject to audit.)

State: Michigan DEQ

Date: June 23, 2004

Program: Compliance Program

PPA #: PPA-4-2

PPA Title: Compliance Assessment

#### PROJECTED STATUS AT END OF FY2004:

A. Work-years of effort: 15.0

B. Key responsible person(s): Gerald Avery & Michael Bray

C. Key responsible group: Field Operations Section & Technical Programs Unit

D. Estimated total PPA costs: \$ 1,371,000

#### PLANNED COMMITMENT FOR FY2005:

A. Work-years of effort: 15.0

B. Key responsible person(s): Gerald Avery & Michael Bray

C. Key responsible group: Field Operations Section & Technical Programs Unit

D. Estimated total PPA costs: \$ 1,320,885

#### E. FY2004-2005 Commitment Narrative:

**For non -Title V sources, the state will:**

##### 1.0 SIP, NSPS, non-transitory NESHAP and MACT, and Minor Source Inspections

- 1.1 The state commits to conduct at least a partial compliance evaluation that includes an on-site inspection for the more significant processes at non-Title V sources selected using the Compliance Monitoring Strategy (CMS) for stationary source inspections.
- 1.2 Staff continue to inspect dry cleaning establishments for compliance with state rules and the perchloroethylene NESHAP. The inspectors will be working with staff of the Environmental Science & Services Division on an Environmental Results Program for the dry cleaners. This is a three year project designed to improve compliance through self-evaluations and self certifications. This paragraph is informational only since these activities are not part of this grant.
- 1.3 After each inspection, a report will be prepared on the results of the inspection, including an identification of the process(es) that was(were) found to be in violation, the process and emission data that were recorded or calculated which document the violation(s), and a statement of the applicable regulation(s) being violated.
- 1.4 The state will work with the Region and perform field investigations for Regional enforcement initiatives for sources targeted for inspection.

## 2.0 Permit Evaluations and Inspections

The state will conduct an appropriate evaluation of site acceptability for applications for permits to install only for the new Greenfield type sources that are the object of substantial public concern and have a very significant potential to cause adverse impacts on the neighboring public. Such evaluations are to include a determination on the acceptability of the proposed source with regard to its impact on the surrounding environment, and may include a determination of compliance with local zoning, if the state has reason to believe that local zoning may be a problem. The evaluation will be documented only if the site is determined to be unacceptable.

## 3.0 Complaint Investigation and Response

- 3.1 The state will enter into a computerized data system all air pollution complaints that are received including the complainant's name, nature of the complaint, any information that could identify the source of any emissions, and the response efforts of the state.
- 3.2 The state will evaluate all priority I and II complaints received for appropriate resolution method, and refer those complaints that can and should be addressed by another agency (local zoning or building department, local health department, or other county or state agency). The state will investigate all priority I and II complaints not referred to other agencies, using established priorities and procedures.
- 3.3 The state will document all violations, which are identified as a result of complaint investigations as resources allow.

## 4.0 Record Review and Documentation

- 4.1 The state commits to review, and document the review of, appropriate production records, reports, and program plans as required by the EPA regulations delegated to the state. The state will determine compliance with applicable regulations as to the timeliness and content of the submittal.
- 4.2 The state commits to document when company reported data regarding process operation, monitor operation, and/or emission data show violations. Permit conditions will be maintained in the inspection file.
- 4.3 The state commits to process compliance waiver applications where allowed by NESHAP and MACT regulations, and monitor compliance waiver milestones.
- 4.4 The state commits to determine if NSPS sources have been tested in accordance with 40 CFR Part 60.

## 5.0 Miscellaneous

- 5.1 The state intends to adopt the federal regulation for municipal solid waste landfill emissions from existing landfills by reference into the state's regulations.

- 5.2 Due to resource limitations, the state is unable to commit neither to implementing the CFC and halon-recycling provisions neither of the federal Clean Air Act Amendments (CAAA) nor to conducting related source inspections. Specific commitments may be made in the event federal funding and/or federal assignee staff is provided.

## PROJECTED PROGRAM ACCOMPLISHMENT (PPA)

### DESCRIPTION FORM

(The information recorded below is for planning purposes only and not subject to audit.)

State: Michigan DEQ

Date: June 29, 2004

Program: Compliance Program

PPA #: PPA-4-3

PPA Title: Escalated Enforcement

#### PROJECTED STATUS AT END OF FY2004:

- A. Work-years of effort: 5.0
- B. Key responsible person(s): Tom Shanley
- C. Key responsible group: Enforcement
- D. Estimated total PPA costs: \$ 457,000

#### PLANNED COMMITMENT FOR FY2005:

- A. Work-years of effort: 5.0
- B. Key responsible person(s): Tom Hess
- C. Key responsible group: Enforcement
- D. Estimated total PPA costs: \$ 440,295

#### E. FY2004-2005 Commitment Narrative:

**For non -Title V sources, the state will:**

##### 1.0 Violation Identification and Documentation

- 1.1 Within 30 days of finding a violation of any state or federal regulation as a result of inspections, review of documents or submitted test data, the MDEQ will send a Letter of Violation (LOV) to the source documenting the violation and requiring corrective action(s).
- 1.2 The MDEQ will maintain a log of all LOVs sent, including the nature of the violation, resolution course-of-action, and current status.
- 1.3 The MDEQ will participate in monthly conference calls with the EPA to provide updated enforcement status information for High Priority Violators [\*], identify new High Priority Violators, identify new CEM violations, and discuss zero date, case lead, evidence, time line for resolution and injunctive and penalty relief, and use of the Supplemental Environmental Project (SEP) Policy dated May 1, 1998. Violations of federal asbestos demolition/renovation regulations and federal multi-media violations will be discussed in the same manner.

##### 2.0 Escalated Enforcement

- 2.1 The MDEQ will initiate the appropriate escalated enforcement response for all SIP, NSPS, PSD, non-transitory NESHAP and MACT violations statewide consistent with the EPA's Revised HPV/T&A Guidance dated December 22, 1998. The MDEQ's specific commitment on case timeliness is item 2.2, below.

- 2.2 By September 30, 2004, the MDEQ commits to resolve all state-lead, High Priority Violations at SIP, NSPS, PSD, non-transitory NESHAP, and MACT sources statewide identified as of October 1, 2001.
- 2.3 The MDEQ will identify and treat as a High Priority Violator, any source that fails to run a federally required CEM, submit data, or maintain compliance with emission limitations (as shown by CEM data) where use of CEM data is the compliance determination method.
- 2.4 The MDEQ commits to require, where appropriate, that violating sources enter into formal enforceable stipulation agreements. The state will pursue appropriate penalties for all High Priority Violators consistent with the EPA's Revised HPV/T&A Guidance dated December 22, 1998.
- 2.5 The MDEQ will initiate appropriate enforcement action that may include revocation of the permit to install or permit to operate against all sources that do not provide a timely and satisfactory corrective program for significant permit violations.
- 2.6 The MDEQ will take appropriate enforcement action on asbestos demolition/renovation work practice violations, consistent with the EPA's Revised HPV/T&A Guidance (dated December 22, 1998), and the Revised Asbestos NESHAP Strategy addendum (dated October 27, 1993), as well as the Asbestos Penalty Policy Guidance (dated May 5, 1992).

### 3.0 Escalated Enforcement Activities

- 3.1 The MDEQ commits to perform the following escalated enforcement activities for all violations referred for enforcement action, including all identified as High Priority Violations. This includes the following activities:
  - a) Review documentation of the violations, staff observations and other file materials to identify potential enforcement options, which may include the EPA involvement related to High Priority Violators.
  - b) Determination of an enforcement strategy, in consultation with field staff and Attorney General's office.
  - c) Preparation of enforcement documents such as Notices of Violation, Administrative Complaints, and Consent Orders.
  - d) Conduct negotiations with violators.
- 3.2 The MDEQ commits to provide litigation support on all air violations referred to the State Attorney General for formal enforcement action. Activities include coordination of technical support for litigation, preparation of litigation summaries, case research, witness preparation, and other assistance to the case attorney.
- 3.3 The MDEQ commits to continue development of enforcement procedures as needed.
- 3.4 The MDEQ agrees to work with the Region to perform field investigations and case development for Regional enforcement initiatives as the MDEQ resources allow. Inspection reports and case documentation shall be prepared as requested.

Notes:

[\*] High Priority Violator is defined to include the following:

1. A major source in violation of a SIP requirement.
2. A major source in violation of a federal regulation (NSPS, NESHAP, MACT, PSD, Offset, or a Major Offset or PSD source operating without an Offset or PSD permit).
3. A major source operating in violation of a substantive term of an order previously entered to resolve a High Priority Violation.
4. A major source in substantial violation of the obligation to submit a Title V permit application or failure to comply with Title V certification requirements.
5. A "synthetic minor" source which violates an emission limitation or permit condition that affects the source's PSD, NSR, or Title V status.
6. A major source in violation of an emission limitation or other standard, which meets the criteria specified in the High Priority Violation Matrix, Section II.B, of the EPA's Revised HPV/T&A Guidance dated December 22, 1998.

## PROJECTED PROGRAM ACCOMPLISHMENT (PPA)

### DESCRIPTION FORM

(The information recorded below is for planning purposes only and not subject to audit.)

State: Michigan DEQ

Date: June 23, 2004

Program: Compliance Program

PPA #: PPA-4-4

PPA Title: Continuous Emission Monitoring (CEM)

#### PROJECTED STATUS AT END OF FY2004:

- A. Work-years of effort: 2.4
- B. Key responsible person(s): Gerald Avery & Michael Bray
- C. Key responsible group: Technical Programs Unit
- D. Estimated total PPA costs: \$ 219,360

#### PLANNED COMMITMENT FOR FY2005:

- A. Work-years of effort: 2.4
- B. Key responsible person(s): Gerald Avery & Michael Bray
- C. Key responsible group: Technical Programs Unit
- D. Estimated total PPA costs: \$ 211,342

#### E. FY2004-2005 Commitment Narrative:

**For non-Title V sources, the state will:**

##### 1.0 CEM Operation

The MDEQ will require the installation and operation of CEM on all sources subject to CEM requirements under current state or federal regulations. The MDEQ will also notify all sources that are required by federal or state regulations to install and operate CEM to submit quarterly Excess Emission Reports (EER) and periodic quality assurance test results.

##### 2.0 Inventory

The MDEQ will maintain an up-to-date database of all facilities subject to a CEM requirement in the SIP or NSPS. The database will include information on the facility, type of source, emission limits/permits, monitoring, and quality assurance.

##### 3.0 Review and Documentation

- 3.1 The MDEQ commits to continue to quality assure existing and new monitors at sources subject to NSPS or SIP requirements.

Quality assurance of monitors shall include review and approval of the monitor certification test, quality assurance/quality control (QA/QC) program, and the most recent performance audit.

- 3.2 The MDEQ commits to review and track quarterly EERs for monitors subject to NSPS and SIP requirements.
- 3.3 The MDEQ commits to review and approve the location for monitors installed on all new sources subject to NSPS regulations and state Part 11 rules.

#### 4.0 Reporting

Within 60 days of the end of each quarter, the MDEQ commits to submit (using PC formatted disk(s) to the EPA the following information:

- a) Updates of the MDEQ's CEM inventory. This includes information on site identification, description of the source, stack parameters, enforcement status, monitor descriptions, certification dates, and the dates of the most recent quarterly QA/QC performed on the monitors.
- b) Copies of all CEM certification letters sent to facilities during the quarter. The letters will indicate if the monitor is a new installation or a replacement monitor.
- c) Summaries of all quarterly excess emissions and monitor performance from facilities required to report to the EPA and the MDEQ.



## PROJECTED PROGRAM ACCOMPLISHMENT (PPA)

### DESCRIPTION FORM

(The information recorded below is for planning purposes only and not subject to audit.)

State: Michigan DEQ

Date: June 23, 2004

Program: Compliance Program

PPA #: PPA-4-5

PPA Title: NESHAP Asbestos Demo/Reno Compliance Program

#### PROJECTED STATUS AT END OF FY2004:

A. Work-years of effort: 3.2

B. Key responsible person(s): Gerald Avery & Michael Bray

C. Key responsible group: Technical Programs Unit

D. Estimated total PPA costs: \$ 292,480

#### PLANNED COMMITMENT FOR FY2005:

A. Work-years of effort: 3.2

B. Key responsible person(s): Gerald Avery & Michael Bray

C. Key responsible group: Technical Programs Unit

D. Estimated total PPA costs: \$ 281,789

#### E. FY2004-2005 Commitment Narrative:

##### 1.0 Inspections

- 1.1 The MDEQ commits to conduct inspections of asbestos demolition/renovation (demo/reno) projects in accordance with the EPA's "Implementation Strategy for Revised Asbestos NESHAP" (dated January 1991). Facilities to be inspected will be identified through notifications, complaints, and other elements of our non-notifier program. Conducting inspections identified from complaints is a high priority for the program because many of the complaints involve violations of the Asbestos NESHAP. Inspections will also be conducted based on asbestos notifications for demo/reno projects. A total of 275 inspections will be conducted provided three inspectors are devoted to the MDEQ's asbestos NESHAP program.
- 1.2 The selection of which asbestos demo/reno projects for which notification has been provided will be inspected based upon an inspection targeting ranking system consistent with the EPA's "Implementation Strategy for Revised Asbestos NESHAP" dated January 1991. Rankings will be documented and maintained on a computer based logging system.
- 1.3 For each inspection of asbestos/NESHAP demolition projects as well as abatement projects and landfills receiving asbestos waste, an inspection checklist will be completed. Upon identification of a potential violation appropriate sampling and analysis for asbestos content will occur. The samples will be maintained under proper chain-of-custody for a period of five years.

## 2.0 Documentation and Review

- 2.1 The MDEQ commits to review all asbestos demo/reno notices received to assure each notice is timely and complete. The MDEQ will retain the original notice. When late or incomplete notice is received, contact will be made with the noticing party within 2 working days requesting missing information for incomplete notices. The response will be reviewed to ensure that the missing information is supplied.
- 2.2 The MDEQ commits to maintain documentation of all subject notifications received, inspections conducted, and violations cited for notification deficiencies and work practices. Information will be maintained on a computer database system.

## 3.0 Reporting

- 3.1 Within 30 days of the end of each quarter, the MDEQ commits to submit quality-assured quarterly reports on formatted disk(s) for the EPA's use with the ACTS II system. The reports will include the following information for activities occurring during the quarter:
  - a) Information on all NESHAP-subject demo/reno notifications received, including: the postmark date, project dates, facility name and address, abatement and demolition contractors, disposal site, late and incomplete deficiencies, deficiency letter date, party determined to be responsible for deficiency, and which notifications are for emergency removal or ordered demolition projects.
  - b) Inspections conducted, including the date of inspection, identification of work practice violations, date of LOV sent, date order entered, and date of referral to the EPA or the State Attorney General for litigation.
- 3.2 The MDEQ commits to submit, upon request, inspection reports in accordance with the asbestos NESHAP strategy.

## 4.0 Non-notifier Program

The MDEQ's non-notifier program will continue to focus on outside agency coordination, self-initiated inspections, and receipt of complaints to identify NESHAP-subject facilities that do not comply with the notification requirements. When traveling to targeted demo/reno projects for inspection, efforts are made to investigate demo/reno's discovered. To the extent feasible, non-notifiers are identified through coordination with state and local agencies that issue building and demolition permits, inspect demo/reno projects or administer other state or federal asbestos programs. In addition, the MDEQ's outreach efforts identify how citizens and industry personnel can report non-notifiers and other potential asbestos NESHAP violations.

## PROJECTED PROGRAM ACCOMPLISHMENT (PPA)

### DESCRIPTION FORM

(The information recorded below is for planning purposes only and not subject to audit.)

State: Michigan DEQ

Date: June 29, 2004

Program: Compliance Program

PPA #: PPA-4-6

PPA Title: Legal Services, Attorney General

#### PROJECTED STATUS AT END OF FY2004:

A. Work-years of effort: 2.0

B. Key responsible person(s): Tom Shanley

C. Key responsible group: Enforcement Unit

D. Estimated total PPA costs: \$145,000

#### PLANNED COMMITMENT FOR FY2005:

A. Work-years of effort: 1.0

B. Key responsible person(s): Tom Hess

C. Key responsible group: Enforcement Unit

D. Estimated total PPA costs: \$ 145,000

#### E. FY2004-2005 Commitment Narrative:

##### For non-Title V sources, the state will:

The state commits to maintain legal services from the State's Attorney General to provide the following:

1. File litigation, as appropriate, to enforce the federal Clean Air Act (CAA) and the air pollution control portion of the Natural Resources and Environmental Protection Act. Defend the MDEQ on all litigation filed against these parties involving air pollution matters.
2. Support administrative enforcement actions through discussions about choice of enforcement options, review of enforcement documents, and representing the MDEQ in contested case hearings.
3. Serve as Legal Counsel to the MDEQ. Participate in and prepare legal documents for all declaratory ruling requests.
4. Provide legal or enforceability certifications, as required under the federal CAA.
5. Advise the AQD on legal issues, particularly on the legality and defensibility of individual policy decisions.
6. Serve as liaison with the EPA Regional Counsel on joint enforcement actions.

## PROJECTED PROGRAM ACCOMPLISHMENT (PPA)

### DESCRIPTION FORM

State: Michigan DEQ

(The information recorded below is for planning purposes only and not subject to audit).

Date: June 25, 2004

Program Category: Air Management

Index: PPA-5

PPA TITLE: Operation of Ambient Air Quality Monitoring Network

PROJECTED STATUS AT END OF FY2004:

PLANNED COMMITMENT FOR FY2005:

A. Work years of effort: 13.0

A. Work years of effort: 13.0

B. Key responsible person: Craig Fitzner

B. Key responsible person: Craig Fitzner

C. Key responsible group: Air Monitoring Unit

C. Key responsible group: Air Monitoring Unit

D. Estimated total PPA costs: \$ 1,546,254

D. Estimated total PPA costs: \$ 1,585,706

#### **E. FY2004-2005 Commitment Narrative:**

The MDEQ's Air Monitoring Unit lost one staff member to medical layoff in May 2004.

From October 1, 2003 through September 30, 2004, the MDEQ continued to operate the National Air Monitoring Stations (NAMS), State and Local Air Monitoring Stations (SLAMS), and SPM air monitoring network in accordance with the EPA-approved standard operating procedures.

PAMS operations during FY04 continued unchanged from FY03. The auto gas chromatograph operated as a continuous VOC measurement device at the Wayne County East 7 Mile Road site (26-163-0019). NO<sub>y</sub> and meteorological monitoring continued at the PAMS site in Holland (26-005-0003). Quality assurance audits were performed as required.

Five toxics monitoring stations—two in Detroit, one in Grand Rapids, one near Houghton Lake (as a rural background toxics and ozone site), and a site in Ypsilanti--were again deployed as part of the Michigan Toxics Air Monitoring Program (MITAMP).

MDEQ coordinated with various USEPA offices in the set up of the Detroit Exposure and Aerosol Research Study (DEARS). As part of this effort, MDEQ gave USEPA and its contractor, RTI, access to the Allen Park air monitoring station.

MDEQ continued to participate with the Wisconsin Department of Natural Resources and the Minnesota Air Pollution Control Agency in the operation of an ambient mercury monitoring trailer. From March to May 2004, the mercury trailer was deployed near an aluminum smelter in southeast Michigan.

MDEQ conducted extensive site upgrades at its Livonia, Dearborn and Southwest High School air monitoring stations.

## **Quality Assurance Program**

Sample completeness for NAMS/SLAMS sites during FY03 exceeded 75 percent at all MDEQ monitoring sites for the SO<sub>2</sub> monitor at Detroit Southwest High School (26-163-0015).

*The MDEQ continued to collect Precision and Accuracy data in accordance with our Standard Operating Procedures. MDEQ expects to meet the 95 percent precision and accuracy probability limits during FY 03 except possible for SO<sub>2</sub> at Detroit Southwest High School (26-163-0015).*

MDEQ Environmental Science and Services Division staff certified our primary ozone standard at the EPA Region V offices during March 2003.

In June 2004, performance audits were conducted by USEPA at Kalamazoo, Holland and Coloma. The MDEQ cooperated with USEPA during these audits.

The MDEQ performed audits, training and other support functions as required by MOA at the Seney and Peshawbestown ozone monitoring sites.

## **Data Management**

During FY04, the MDEQ continued to process and report air quality data to AQS. All precision and accuracy data has been submitted to the EPA on schedule. The 2003 SLAMS Summary report was certified in July 2004.

The MDEQ continued to upload ozone and PM<sub>2.5</sub> data to USEPA's AIRNOW system. After a review of MDEQ's FY03 data transmission statistics, MDEQ increased the number of hours of data uploaded daily in FY04 from 17 to 24.

Because of travel and budgetary restrictions, MDEQ staff did not attend the 2004 national AQS conference.

The MDEQ staff published its 2002 in October 2003 and will have its 2003 report published by September 30, 2004.

## **F. FY2005 Commitment Narrative**

### **Operation of Ambient Air Monitoring Network:**

A draft equipment list for FY2005 is submitted to the EPA September 30, 2004 with this PPA.

We will continue to operate the Michigan Toxics Air Monitoring Network (MITAMP) and will continue to coordinate with USEPA in the analysis and the reporting of data collected thus far.

MDEQ will continue the deployment of the collaborative ambient mercury monitoring trailer.

MDEQ will work with the USEPA and its contractors in support of the Detroit Exposure and Aerosol Research Study.

The MDEQ will begin operation of an ozone monitor in Cassopolis (Cass County) by April 1, 2005. This station was previously operated by the Indiana Department of Environmental Management.

## **Quality Assurance Program**

Operation of the NAMS/SLAMS and PAMS networks will continue. Proposed solutions for any technical deficiencies found in EPA audits will be submitted within 30 days, in accordance with 40 CFR 58.25.

MDEQ will strive to have sample completeness for NAMS/SLAMS sites exceed 75 percent at all sites.

The MDEQ will continue to collect Precision and Accuracy data in accordance with our Standard Operating Procedures.

MDEQ Environmental Sciences and Services staff will certify a primary ozone standard at the USEPA Region V offices prior to the deployment of its ozone monitors in March 2005.

The MDEQ will participate in any mandated inter-laboratory audits.

If the Memorandum of Agreements continues in FY05, the MDEQ will perform audits and other support functions at the Seney and Peshawbestown ozone monitoring sites. The MDEQ also anticipates signing a similar MOA with the Little River Band of Ottawa for ozone monitoring in Manistee County.

## **Data Management**

MDEQ will continue to process and report air quality data as well as precision and accuracy data to AQS within 90 days of the end of each calendar quarter.

MDEQ will continue to collect and upload hourly PM2.5 and ozone data to AIRNOW in a timely manner.

Given adequate funding, MDEQ staff will attend the national AQS/AIRS conference in 2005.

MDEQ staff will publish its annual air quality report for 2004 by September 30, 2005.

**AQD Equipment, CSS&M and Contractual Budget for AMU: \$413,005**

**A. Equipment-\$185,227**

Item	Quantity Budgeted	Unit Cost	Item Cost	Running Total Expenditure
API multi-pollutant calibrators	5	\$17,000	\$85,000	\$85,000
API ozone monitors	5	\$6,662	\$33,310	\$118,310
TEICO carbon monoxide monitors	2	\$8,333	\$16,667	\$134,977
TEICO sulfur Dioxide monitors	2	\$8,925	\$17,850	\$152,827
ATEC carbonyl samplers	6	\$5,400	\$32,400	\$185,227

**B. CSS&M-\$227,778**

Category	Item	Unit Cost	Item Cost	Running Total
Criteria (operation support contracts)	Houghton Lake contract	\$5,380/yr	\$5,380	\$5,380
Criteria	Mowing contract (Lansing)	\$500	\$500	\$5,880
Criteria	Snow removal contracts	\$1,000	\$1,000	\$6,880
Criteria	General site maintenance supplies	\$1,000	\$1,000	\$7,880
Criteria	Heating & cooling unit for shelters	\$1,200	\$1,200	\$9,080
Criteria	Cassopolis site upgrades	\$10,000	\$10,000	\$19,080
Criteria	Precision & Span Gases	\$5,445	\$5,445	\$24,525
Criteria	Misc. telecommunication and electrical upgrades and monthly access fees	\$10,000	\$10,000	\$34,525
Criteria	PM10/Pb data program upgrade	\$3,000	\$3,000	\$37,525
Criteria	(3) Yogahawa strip chart recorders	\$1,000	\$3,000	\$40,525
Hg	Lumex Calibration	\$500	\$500	\$41,025
Hg	Air Gases for Tekrans	\$1,315	\$1,315	\$42,340
Hg	LP gases for Tekrans	\$425	\$425	\$42,765
Hg	Misc Tekran Parts and Repair	\$1,500	\$1,500	\$44,265
MDEQ LAB	MDEQ Shop Services	\$55,000	\$55,000	\$99,265
MDEQ LAB	MDEQ Lab Standards & Supplies and analytical equipment repair	\$20,000	\$20,000	\$119,265
MITAMP	27 Boxes Carbonyl Cartridges	\$200	\$5,400	\$124,665
MITAMP	Through the probe audit gases	\$11,000	\$11,000	\$135,665
MITAMP	National Lab Services	\$47,538	\$47,538	\$183,203

MITAMP	2 Summa Canisters	\$495	\$990	\$184,193
PAMS	1 SYSDAT Statistical Package	\$2,000	\$2,000	\$186,193
PAMS	GC operation Gases	\$1,000	\$1,000	\$187,193
PAMS	4 Time blocks for GC support (contract)	\$8,000	\$32,000	\$219,193
PAMS	GC Service Contract	\$4,700	\$4,700	\$223,893
QA	Audit gases	\$1,385	\$1,385	\$225,278
QA	Probe inlet audit plumbing	\$1,500	\$1,500	\$226,778
QA	Met Data Auditing Supplies	\$1,000	\$1,000	\$227,778
			<b>TOTAL CSSM</b>	<b>\$227,778</b>



PROJECTED PROGRAM ACCOMPLISHMENT (PPA)

DESCRIPTION FORM

State: Michigan DEQ

(The information recorded below is for planning purposes only and not subject to audit).

Date: June 23, 2004

Program: Air Management

Index: PPA-6

PPA TITLE: Point Source Emissions Data

PROJECTED STATUS AT END OF FY 2004:

PLANNED COMMITMENT FOR FY2005:

A. Work-years of effort: 3.5

A. Work-years of effort: 3.5

B. Key responsible person: John Schroeder

B. Key responsible person: John Schroeder

C. Key responsible group: Emissions Reporting and Assessment Unit

C. Key responsible group: Emissions Reporting and Assessment Unit

D. Estimated total PPA costs: \$ 319,900

D. Estimated total PPA costs: \$ 308,207

**E. FY2004-2005 Commitment Narrative:**

The MDEQ will submit the year 2002 emissions data in accordance with the requirements contained in the EPA Consolidated Emissions Reporting Rule (40 CFR 51.1 – 51.45) prior to June 1, 2004 (Note that the submittal was made May 27, 2004). The 2002 data will include estimates for point, area and off-road mobile emissions. Mobile 6 model input files and VMT estimates were submitted to EPA as an alternative to calculating on-road vehicle emissions. The 2002 inventory will be modified, as necessary, based on contractor recommendations (through LADCO) and future data analyses. The MDEQ will continue to devote resources to upgrade the state inventory system to ensure compatibility with new EIIP procedures and the data reporting requirements identified in the Consolidated Emissions Reporting Rule.

As resources allow, the MDEQ will send representatives to appropriate national emissions inventory conferences and NEI training sessions or conferences held at the EPA Region 5 office. The MDEQ will continue to support efforts by the EPA, LADCO, and others to improve the national ozone modeling inventories for use in attainment demonstrations and will participate in the development of a regional inventory to support the regional haze and PM2.5 planning effort.

## PROJECTED PROGRAM ACCOMPLISHMENT (PPA)

### DESCRIPTION FORM

(The information recorded below is for planning purposes only and not subject to audit.)

State: Michigan DEQ

Date: August 11, 2004

Program: Air Management

Index: PPA-7

PPA Title: Great Lakes Air Toxics Deposition

#### PROJECTED STATUS AT END OF FY2004:

A. Work-Years of Effort: 3.2

B. Key Responsible Person: Joy Taylor Morgan

C. Key Responsible Group: Environmental Science, Services & Emissions, Reporting and Assessment

D. Estimated Total PPA Costs: \$292,480

#### PLANNED COMMITMENT FOR FY2005:

A. Work-Years of Effort: 3.2

B. Key Responsible Person: Joy Taylor Morgan

C. Key Responsible Group: Environmental Science, Services & Emissions, Reporting and Assessment

D. Estimated Total PPA Costs: \$ 281,789

#### E. **FY2004-2005 Commitment Narrative:**

The AQD will participate in research projects and policy issues that address identification and reduction of persistent bioaccumulative air toxic pollutants.

The AQD will continue to participate in the development of the regional air pollutant inventory development system (RAPIDS) currently administered by the Great Lakes Commission in coordination with the USEPA efforts. The AQD will continue to submit Great Lakes air toxics emissions data to the EPA and the Great Lakes Commission in RAPIDS format.

The AQD will participate in the Great Lakes Atmospheric Deposition (GLAD) program grant process, coordinated by the Great Lakes Commission, and work with other partners in the region on policy issues that address atmospheric deposition of persistent bioaccumulative pollutants to inland lakes and the Great Lakes.

The AQD will participate in work groups and task forces on atmospheric deposition of air toxics as appropriate and as resources allow.

The AQD will continue efforts focused on monitoring and reduction activities related to sources that emit mercury and products that contain mercury focusing on pollution prevention and recommended alternatives to these products to continue to reduce the use and release of mercury to Michigan's environment.

The AQD will continue use of mercury monitoring equipment purchased with Great Lakes Section 105 funds, and coordinate with Minnesota and Wisconsin on the shared use of this equipment.

## PROJECTED PROGRAM ACCOMPLISHMENT (PPA)

### DESCRIPTION FORM

Agency: Michigan DEQ

(The information recorded below is for planning purposes only and not subject to audit.)

Date: June 30, 2004

Program Category: Air Management

Index: PPA-10

PPA TITLE: Market-based Initiatives

PROJECTED STATUS AT END OF FY 2004:

PLANNED COMMITMENT FOR FY2005:

A. Work-years of effort: 1.0

A. Work-years of effort: 1.0

B. Key responsible person: Robert Irvine

B. Key responsible person: Robert Irvine

C. Key responsible group: Strategy Dev. Unit

C. Key responsible group: Strategy Dev. Unit

D. Estimated total PPA costs: \$ 91,400

D. Estimated total PPA costs: \$ 88,059

#### E. **FY 2004-2005 Commitment Narrative:**

##### **FY2004 Status to Date:**

The MDEQ continued working with the EPA Region 5 staff to obtain federal approval for the Emission Trading Program. This has focused on understanding and evaluating concerns described in the September 30, 2002 report from the Office of Inspector General.

The MDEQ continued to provide input via LADCO and directly to the EPA on regional and national emission trading issues and emission trading policy development.

As of June 30, 2004, the MDEQ received 48 Program notices for FY (2003), of which 45 were for ERC generation, 2 for ERC use, and 1 for ERC transfer. The program automatically retired 36 ERCs for date expiration.

On a daily basis, the MDEQ has provided technical support to the regulated community. This has included assistance in: 1) completing Program notices, 2) answering questions regarding the requirements of the Program and review status of the notices, 3) discussing proposed trading scenarios, and 4) providing information related to the federal approvability issues and rulemaking process.

##### **FY 2005 Commitment:**

The MDEQ will continue to work with the EPA to gain federal approval for the Program SIP submittal.

The MDEQ will continue to provide input on regional, national, and international emission trading program developments.

The MDEQ will continue to process all Program notices received.

The MDEQ will continue to administer the Program Registry and Emission Trading Home Page on the Internet, and will carry out further Registry enhancements and information upgrades as needed.

The MDEQ will continue to revise operational procedures needed for implementation of the Program as needed. The MDEQ will conduct a sufficient number of audits of emission averaging plans and ERC transactions across a spectrum of sources.

The MDEQ will continue to provide technical assistance to the regulated community and other potential Program participants.

## PROJECTED PROGRAM ACCOMPLISHMENT (PPA)

### DESCRIPTION FORM

State: Michigan DEQ

(The information recorded below is for planning purposes only and not subject to audit.)

Date: June 21, 2004

Program: Air Management

Item: PPA-11

PPA Title: New Source Review

#### PROJECTED STATUS AT END OF FY2004:

A. Work Years of Effort: 12.0

B. Key Responsible Person: Lynn Fiedler

C. Key Responsible Group: Permit Section

D. Estimated Total PPA Cost: \$ 1,096,800

#### PLANNED COMMITMENT FOR FY2005:

A. Work Years of Effort: 12.0

B. Key Responsible Person: Lynn Fiedler

C. Key Responsible Group: Permit Section

D. Estimated Total PPA Cost: \$ 1,056,708

#### E. FY2004-2005 Commitment Narrative:

The AQD commits to continue conducting independent engineering reviews of applications for new or modified minor sources of air pollution. These reviews determine whether or not the proposed source is able to comply with all applicable state requirements, including air toxics, state BACT for VOC, emission limitations, nuisance prohibition, and protection of NAAQS and PSD increments. Public comment periods and hearings will be held for all controversial applications in accordance with state requirements.

The AQD commits to continue developing additional exemption rules, and developing general permits to install, in order to further streamline state permit requirements for minor sources of little air quality significance.

The AQD commits to work cooperatively with the EPA to assure that the MDEQ's Clean Corporate Citizen program is implemented in a manner that is consistent with the federal new source review regulations.

PROJECTED PROGRAM ACCOMPLISHMENT (PPA)

DESCRIPTION FORM

State: Michigan DEQ

(The information recorded below is for planning purposes only and not subject to audit.)

Date: June 25, 2004

Program: Air Management

Item: PPA-12

PPA TITLE: Support Services - Laboratory and Maintenance

PROJECTED STATUS AT END OF FY2004:

PLANNED COMMITMENT FOR FY2005:

A. Work-years of effort: 6.8

A. Work-years of effort: 6.8

B. Key responsible person(s): Amy Butler

B. Key responsible person(s): Amy Butler

C. Key responsible group: Environmental Science and Services

C. Key responsible group: Environmental Science and Services

D. Estimated total PPA costs: \$437,119

D. Estimated total PPA costs: \$ 437,119

**E. FY2004-2005 Commitment Narrative:**

This PPA provides support services, which include laboratory and equipment maintenance functions as follows:

**Laboratory Services:** Provide analytical and technical services that include filter analyses, sample analyses, development of analytical methods, and identification of toxic air pollutants. The laboratory also verifies standards used in the field for calibration of equipment.

**Equipment Maintenance Services:** Provide equipment maintenance and repair services for air monitoring and air sampling equipment.